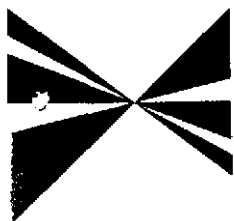


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SOUTHERN CALIFORNIA



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**Ventura County Transportation Commission:** Bill Davis, Simi Valley

September 23, 1999

Mr. Rick Breitenbach  
CALFED BAY-DELTA PROGRAM  
1416 Ninth Street Suite 1155  
Sacramento, CA 95814

RE: Our Comments and Principles on the Draft Programmatic  
Environmental Impact Statement/Report  
(SCAG IGR# I19990371)

Dear Mr. Breitenbach:

On behalf of the Regional Council of the Southern California Association of Governments (SCAG) I am submitting our official PEIS/R Policy and Technical Comments, along with our adopted CalFed Policy Principles and Testimony. These are contained in the four enclosed attachments.

SCAG has taken an active interest in the CalFed process, hoping that this extraordinary effort to improve our state's water future will succeed. At your public hearings in the SCAG region in August and September we expressed our concerns about the proposed Program in the key areas of water quality, water supply, governance and financing. We strongly believe that the long-term success of a CalFed Program requires the modifications and specificity we've suggested.

Our Association of Governments represents 188 cities and 6 counties in southern California, with elected officials representing more than 16 million people. Since we expect that by 2020 this region will be home to more than 23 million residents (an increase of nearly 50%) you can understand our sense of urgency about CalFed's success.

Sincerely yours,

Mark Pisano  
Executive Director

Enclos.

## ATTACHMENT 1

### OFFICIAL POLICY COMMENTS ON CALFED'S PREFERRED PROGRAM ALTERNATIVE IN ITS REVISED PROGRAMMATIC EIR/S

Adopted on September 2, 1999 by the Regional Council of the  
Southern California Association of Governments

1. **Finance:** There is no detailed financing plan expected until around the time of the Record of Decision. It would be sensible to have a detailed financing plan available for comment well in advance of the time for a Record of Decision.
2. **Governance:** There is no proposal for a long-term CalFed Governance structure. The current decision structure which is a collection of independent agencies is strictly an interim structure. Looking forward to long-term Program implementation and accountability, an integrated, cohesive structure is essential. This structure would have delegated authorities from state and federal agencies that would give appropriate power to the entity responsible for delivering on Program promises and intent.
3. **Water Management:** The proposed Program calls for flexible water management but there is no management framework proposed that guarantees a more reliable water supply or needed net increases in water deliveries. The need for clear guarantees was evident in 1998 when, in spite of a very wet year, water deliveries from the Delta were cutback by 500,000 acre feet in order to accommodate the ecosystem needs of the Delta smelt fish. A program in which all plans and commitments are randomly overridden by the workings, for example, of the Endangered Species Act is an incomplete program.
4. **Assurances:** The Program needs clear assurances that identified objectives and plans give assurances of fulfillment to the stakeholders who expect to pay for Program costs. At present, for example, the Program identifies water quality targets but does not make firm commitments on the quality of water and a timetable for that water to be produced by the Program. Even the targets for improved quality fall far short of the source water quality needed by agencies in the SCAG region in order to be in compliance with drinking water regulations or to make most efficient use of their water supplies. Even though failure to meet these water quality targets was identified as the basis for building an isolated facility, those "triggering" targets have still not been specified, not to mention any other requirements required for quickly implementing this additional conveyance.

## **ATTACHMENT 2**

### **OFFICIAL POLICY PRINCIPALS ON CALFED'S BAY-DELTA PROGRAM**

**Adopted on September 2, 1999 by the Regional Council of the  
Southern California Association of Governments**

*The issue of greatest concern to southern California is improved water quality. With higher quality water reaching the SCAG region our communities will be able to reclaim and reuse water for additional uses, bringing greater reliability and drought-proofing. This improvement in water quality is all the more important considering the future compliance burdens on the region that will be created by stricter Federal Clean Water Act standards.*

*Along with water quality we need an integrated water system that delivers timely and adequate supplies, using appropriate storage and conveyance resources in the system. We see connections between quality and supply that deserve careful consideration by Bay-Delta decision-makers.*

*In order to implement a complex, long-range Bay-Delta program we need a streamlined decision process that works with needed planning and feasibility studies, entitlements, analyses and permits. An effective decision process necessitates a governance structure that is integrated and capable of making authoritative decisions that bind all of the CalFed parties to orderly implementation and action. Delays must be avoided in order for the over-all program to keep faith with all Californians.*

*Funding for Bay-Delta improvements must be developed around a specific financing plan. In the interests of equity among all stakeholders, a specific plan must balance CalFed benefits received and CalFed costs paid. This plan must also include the costs incurred outside the Delta by stakeholders who receive impaired Delta source water that needs local treatment to comply with federal and state drinking water regulations. This plan's specific financing strategies need to be developed clearly with stakeholder involvement and must be fiscally sound. For example, any new demands on the Delta water supply created by CalFed environmental and recreational projects need to be funded comprehensively as a recognition of the general public benefits delivered.*

*Southern California needs assurances that any CalFed solution will provide regional, as well as statewide benefits in an equitable, timely and balanced manner. Ecosystem and water management considerations, for example, need to be managed within a "no surprises" framework, allowing the program to proceed with a minimum of disruption and delay. Along with a "no surprises" approach other assurances regarding quality standards for delivered water, infrastructure development and flexible system management solutions must be objectively evaluated, selected, and implemented for the benefit of the Bay-Delta system and for all Californians.*

## **ATTACHMENT 3A**

Remarks by

**EILEEN ANSARI**

Councilmember, City of Diamond Bar

Speaking for the Water Policy Task Force

of the Southern California Association of Governments

August 19, 1999

Regarding CalFed's Preferred Program Alternative  
And its Water Quality Element

Good evening. My name is Aileen Ansari and I am a Councilmember from Diamond Bar. I am addressing you this evening in my capacity as a member of the Water Policy Task Force of the Southern California Association of Governments, the organization informally known in this area as SCAG. The remarks I am making for your record of public comment are based on the Task Force's consideration this week of your updated Programmatic EIS/EIR. The Task Force advises SCAG's regional governing body on water issues. At its meeting on September 2, that body will formally consider for final presentation to you the unanimously recommended Program comments and CalFed Policy Principles of the Task Force. In the meantime the SCAG Water Policy Task Force wants me to review with you tonight certain concerns we have with the selection you have made of the Preferred Program Alternative.

While we are very aware of the complexity of the Bay-Delta water system and the difficulty this has created for your work with so many interest groups, we are very concerned about the Program's ability to improve water quality throughout the system.

As you well know, improving water quality has been one of the four major goals of your process. This key objective has enormous significance for the Delta's ecosystem as well as for water consumers in northern and central and southern California.

To CalFed's credit the proposed Program identifies the need to lower salinity, organic, and bromide levels in the Delta. We do need improvements in these areas!

What causes us concern, however, is the lack of clear commitments to achieve specific improvement results. Without a clear commitment, for example, to deliver 150 TDS water, the urban water agencies serving southern California are faced with much lower water use efficiencies. Without a clear commitment to get control of the bromide problem, these agencies are faced with significant local treatment costs in order to comply with tougher drinking water standards.

The impact of expensive treatment costs that would result from CalFed's failure to deliver water of sufficient quality in Stage 1 is an impact that is not addressed satisfactorily in the Preferred Program Alternative. For whatever its benefits, adaptive management in this element does not assure us of CalFed's commitment to real improvements in water quality.

In order for all of the state to participate in expensive levee restorations and habitat or species protection we need to count on better quality water in the Delta and south of the Delta. If this quality is left to be a "we'll try our best" element of the Program I have to tell you that the Program will not gain the support it needs to succeed. With early Program expenses exceeding \$5 billion it is obvious to us that real, timely value must be delivered to those who pay the bill.

With the Program's current fuzziness on expected water quality results we believe that CalFed needs to sharpen its pencils and bring us a Program that we can support because it will produce cleaner water on predictable terms in needed timeframes.

## **ATTACHMENT 3B**

Remarks by  
EILEEN ANSARI  
Councilmember, City of Diamond Bar  
Speaking for the Water Policy Task Force  
of the Southern California Association of Governments  
August 24, 1999

### **Regarding CalFed's Preferred Program Alternative And its Governance Element**

Good evening. My name is Aileen Ansari and I am a Councilmember from Diamond Bar. I am addressing you this evening in my capacity as a member of the Water Policy Task Force of the Southern California Association of Governments, the organization representing local and county governments in Ventura, Los Angeles, Orange, San Bernardino, Riverside and Imperial Counties. The remarks I am making for your record of public comment are based on the Task Force's consideration of your updated Programmatic EIS/EIR. The Task Force advises SCAG's regional governing body on water issues. At its meeting on September 2, that body will formally consider for final presentation to you the unanimously recommended Program comments and CalFed Policy Principles of the Task Force.

In the meantime the SCAG Water Policy Task Force wants me to review with you tonight certain concerns we have with the selection you have made of the Preferred Program Alternative. While we are very aware of the complexity of the Bay-Delta problems and the variety of interests affected by these problems, we are very concerned about the Program's silence on its long-term governance.

We see a very real connection between the complexity of the Bay-Delta problems and the need for a reliable governance structure. Up to this point the process has been a collaboration among 15 state and federal agencies and various stakeholders. In this effort at developing Bay-Delta solutions each of these parties has retained their autonomy and independence of action.

Unfortunately, the Preferred Program Alternative does not provide anything more than an interim governance solution. And that solution merely continues the unwieldy and uncertain arrangement now in place. For this reason we believe that the Preferred Program needs additional refinement and reality before it can earn the support of local governments in Southern California and the people who will be asked to pay for this Program.

We believe that the successful long-term implementation of balanced Bay-Delta solutions requires an integrated, cohesive governance structure. This kind of structure is needed to bind all of the CalFed parties to streamlined processes that include independent feasibility studies, authoritative decisions, and project entitlements or permits. It is also important that the representation of interests in this structure bear some relationship to the financial contributions being made.

We are looking for a permanent governance solution in which autonomous state and federal agencies delegate their Bay-Delta authorities to the CalFed implementation agency. This approach not only creates needed accountability in Phase III plans and actions, it gives appropriate power to the entity responsible to all Californians for delivering on the Bay-Delta Program's promises and intent in our lifetimes.

**ATTACHMENT 3C**  
**HARRY L. BALDWIN**  
Vice Mayor, City of San Gabriel  
Speaking for the Water Policy Task Force  
of the Southern California Association of Governments  
August 31, 1999

Regarding CalFed's Preferred Program Alternative  
And its Financing Element

Good evening. My name is Harry Baldwin and I am the Vice Mayor of the City of San Gabriel and President of the San Gabriel Valley Council of Governments. I am addressing you this evening in my capacity as a member of the Water Policy Task Force of the Southern California Association of Governments, the regional organization representing city and county governments in Ventura, Los Angeles, Orange, San Bernardino, Riverside and Imperial Counties.

The remarks I am making for your record of public comment are based on the Task Force's consideration of your updated Programmatic EIS/EIR. The Task Force advises SCAG's regional governing body on water issues. At its meeting on Thursday, September 2, that body will formally consider for final presentation to you the unanimously recommended Program comments and CalFed Policy Principles of the Task Force.

In the meantime the SCAG Water Policy Task Force wants me to review with you tonight certain concerns we have with the Financing Plan for your Preferred Program Alternative.

It is of great concern to us that you want us to comment on a financing plan that does not yet exist. You set September 23<sup>rd</sup> as the deadline for our comments on the financing plan, but the actual financing plan will not be published until sometime next year. This is not right.

We appreciate the importance of a real financing plan. That's why we believe the selection of a preferred alternative cannot precede the completion of the plan that prices the benefits and allocates the costs.

It is not enough to have a discussion of the various techniques of financing, to consider the range of possibilities from general obligation bonds and government expenditures to user fees and charges. Instead, we need a realistic plan that allows individuals and businesses, governments and water agencies to assess the cost-benefit realities of a preferred alternative.

As you know from our previous testimony on our region's water quality needs, we are very uncertain about your program's ability to deliver higher quality water. If, because of the choices you recommend, not to mention the unknowns of nature, even seismic calamity, our source water quality is impaired in the Delta, we will have significant local treatment costs to pay. Unfortunately, federal clean drinking water standards are not as flexible as your "wait and see" approach to water quality projects.

As you can understand, these local treatment costs are extended costs for your program and for our region's valuable state project water. Since these extended costs create the true cost for the Program in southern California, we ask you to fully include these potential added costs in next year's financing plan. We need, all the stakeholders need, the total picture. Thank you.

### **ATTACHMENT 3D**

**ARTHUR C. BROWN**

Councilmember, City of Buena Park  
Speaking for the Regional Council  
of the Southern California Association of Governments  
September 2, 1999

#### **Regarding CalFed's Preferred Program Alternative And its Water Supply and Reliability Element**

Good evening. My name is Art Brown and I am a Councilmember of the City of Buena Park. I am addressing you this evening in my capacity as Chairman of the Water Policy Task Force of the Southern California Association of Governments, the regional organization representing city and county governments in Ventura, Los Angeles, Orange, San Bernardino, Riverside and Imperial Counties.

The remarks I am making reflect the policy voted on by the Regional Council, SCAG's governing body. In its decision earlier today it formally adopted a set of comments on your proposed Program, as well as a statement of CalFed policy principles. These comments and principles as recommended by our Task Force have shaped our testimony for the region in three previous CalFed public hearings. At those hearings our elected officials have offered comments on source water quality from the Delta, CalFed governance, and CalFed financing. I am placing in the record tonight a copy of the Regional Board's actions, as well as copies of our previous testimony.

My testimony this evening is about our region's need for water supply and reliability. Five years ago as we began this process, water supply and reliability were major goals for CalFed. We worked through complex problems anticipating a balanced Preferred Program Alternative that would bring comprehensive improvements. Unfortunately we are still waiting for a balanced Program.

It is disappointing to review California's recent water history. In the last two decades we have seen the neglect and decline of our state's water supply and delivery system. In the past 10 years alone, the state's cities and farms have lost more than a million acre feet of water supply from the Delta.

In order for us to support a CalFed solution, we need to have reliable new supplies that in combination with our local supplies will meet the needs of our growing region. By 2020 we will have 7 million more residents in our part of southern California who will be conserving and reclaiming and recycling water at unprecedented rates. And even at these rates we need a CalFed solution that delivers an average of 75% of our area's state water entitlement, not the usual 40% or less. And remember: our region is already paying every year for about a million acre feet that we never receive!

When we look in Stage 1 for a Program that delivers, what we get instead is one that drips.

An optimist looks at your Program and sees a chance for 200,000 acre feet of annual new water supplies. A realist sees a chance of new annual losses of another 700,000 acre feet. It's hard to believe, but we can wonder if CalFed is moving California backwards!

We urge you to meet your responsibilities to ALL the people of California. Enact operating and regulatory policies for reliability...

- that eliminate surprises even in wet years,
- that protect us against sudden calamities,
- that rely on good science and informed decision-making,
- that reflect real urgency in implementing new water supply and storage projects.

These policies will not only get us through our next drought, they will strengthen our economy and our ability to pay for other improvements needed in the Delta. Thank you.

## **ATTACHMENT 4**

### **COMMENTS ON THE DRAFT PROGRAMMATIC ENVIRONMENTAL IMPACT STATEMENT / ENVIRONMENTAL IMPACT REPORT FOR THE CALFED BAY-DELTA PROGRAM**

**ADOPTED BY THE  
REGIONAL COUNCIL  
OF THE  
SOUTHERN CALIFORNIA  
ASSOCIATION OF GOVERNMENTS  
ON SEPTEMBER 2, 1999**

#### **PROJECT DESCRIPTION**

The CALFED Bay-Delta Program is a cooperative effort by fifteen state and federal agencies with regulatory and management responsibilities in the San Francisco Bay-Sacramento/San Joaquin River-Bay Delta to develop a long-term plan to restore ecosystem health and improve water management for beneficial uses of the Bay-Delta System. The objective of this collaborative planning process is to identify comprehensive solutions to the problems of ecosystem quality, water use efficiency, water quality, Delta levee and channel integrity.

#### **INTRODUCTION TO SCAG REVIEW PROCESS**

The document that provides the primary reference for SCAG's project review activity is the **Regional Comprehensive Plan and Guide (RCPG)**. The RCPG chapters fall into three categories: core, ancillary, and bridge. The **Growth Management** (adopted June 1994), **Regional Mobility** (adopted June 1994), **Air Quality** (adopted October 1995), **Hazardous Waste Management** (adopted November 1994), and **Water Quality** (adopted January 1995) chapters constitute the core chapters. These core chapters respond directly to federal and state planning requirements. The core chapters constitute the base on which local governments ensure consistency of their plans with applicable regional plans under CEQA. The Air Quality and Growth Management chapters contain both core and ancillary policies, which are differentiated in the comment portion of this letter. The Regional Transportation Element (RTE) constitutes the region's Transportation Plan (also referred to as Community Link 21). The RTE policies are incorporated into the RCPG.

Ancillary chapters are those on the Economy, Housing, Human Resources and Services, Finance, Open Space and Conservation, **Water Resources**, Energy, and Integrated Solid Waste Management. These chapters address important issues facing the region



and may reflect other regional plans. Ancillary chapters, however, do not contain actions or policies required of local government. Hence, they are entirely advisory and establish no new mandates or policies for the region.

Bridge chapters include the Strategy and Implementation chapters, functioning as links between the Core and Ancillary chapters of the RCPG.

Each of the applicable policies related to the proposed project are identified by number and reproduced below in italics followed by SCAG staff comments regarding the consistency of the Project with those policies.

### **General SCAG Staff Comments**

In terms of CEQA:

1. Guidelines Section 15125, Environmental Setting, Subsection [c] requires discussion of the regional setting. Further, commentary included in the **Discussion** following the cited section states:..*"A number of agencies have been required to spend large amounts of public funds to develop regional plans as a way of dealing with large-scale environmental problems involving air and water pollution, solid waste and transportation. Where individual projects would run counter to the efforts identified as desirable or approved by agencies in the regional plans, the Lead Agency should address the inconsistency between the project plans and the regional plans."*...
2. In addition, Section 15125 [d] states that: *"The EIR shall discuss any inconsistencies between the proposed project and applicable general plans and regional plans. Such regional plans include, but are not limited to, the applicable air quality attainment or maintenance plan or State Implementation Plan, area-wide waste treatment and water quality control plans, regional transportation plans, regional housing allocation plans, habitat conservation plans, natural community conservation plans and regional land use plans for the protection of the Coastal Zone, Lake Tahoe Basin, San Francisco Bay, and Santa Monica Mountains."*
3. The DEIR states that no potentially significant unavoidable impacts on urban land uses are associated with preferred program alternative. Due to the programmatic nature of the environmental document, only general information is provided at this time, and specific effects of the project will be determined in subsequent environmental analysis as program improvements are sited and scheduled for implementation.

SCAG would be interested in receiving copies of future documents which evaluate the environmental impacts of future projects on the SCAG Region. At that time,

we will comment on the consistency of the proposal with the appropriate regional plans.

The DEIR does include future population and water usage for Southern California, which shows a population increase of 46% over the 1990 census population for the year 2020. This number is generally consistent with SCAG's regional forecast for the same year

### **Consistency With Regional Comprehensive Plan and Guide Policies**

**The Growth Management Chapter (GMC)** of the Regional Comprehensive Plan and Guide contains a number of policies that are particularly applicable to the CALFED Bay-Delta Project.

#### ***a. Core Growth Management Policies***

*3.01 The population, housing, and jobs forecasts, which are adopted by SCAG's Regional Council and that reflect local plans and policies, shall be used by SCAG in all phases of implementation and review.*

SCAG staff comments. The Draft EIS/EIR includes a discussion of existing and forecasted year 2020 population and economic indices. The data is portrayed by major geographic region including the Delta, San Francisco Bay, Sacramento River, San Joaquin River and State Water Project (SWP)/Central Valley Projects (CVP) Outside the Central Valley. Portions of the State Water Project region, served by the Metropolitan Water District of Southern California,

lie within the SCAG region. The population forecasts for these regions reflect California Department of Finance estimates. The economic forecasts were derived from CALFED's IMPLAN input-output data base.

The Draft EIS/EIR acknowledges that, "no significant direct or indirect effects on urban land uses in the SWP and CVP Service Areas Outside the Central Valley." In addition, the Draft EIS/EIR specifically note that, "the compatibility and consistency of potential CALFED actions with county and city general plans and local land use plans are not evaluated in this programmatic-level of analysis."

The population and water supply/use forecasts in of the Draft EIS/EIR for the SWP portion of the SCAG region are consistent with forecasts contained in the Draft California Water Plan Update (Bulletin 160-98). SCAG's comments on this document noted that the forecasts do not include a comparison with the recently adopted RTP97 SCAG Population, Household and Employment forecasts for year 2020. These forecasts follow:

| County Forecasts | Ventura | Los Angeles | Orange    | Riverside | San Bernardino | Imperial | SCAG Region |
|------------------|---------|-------------|-----------|-----------|----------------|----------|-------------|
| Population       | 932,300 | 12,249,100  | 3,244,600 | 2,816,000 | 2,830,100      | 280,000  | 22,352,000  |
| Households       | 326,400 | 3,984,100   | 1,102,300 | 918,000   | 904,900        | 84,600   | 7,320,000   |
| Employment       | 485,500 | 5,817,600   | 2,116,600 | 960,800   | 1,103,400      | 89,900   | 10,574,000  |

We recommended that the Department of Water Resources contact SCAG's data unit and request a disaggregation of our recently adopted population, housing and employment forecasts to correspond with the boundaries of the South Coast, South Lahontan and Colorado River hydrologic regions. Based on the information provided in the Draft EIS/EIR, we are unable to determine whether the Bay-Delta Program is consistent with this core RCPG policy.

**3.03** *The timing, financing, and location of public facilities, utility systems, and transportation systems shall be used by SCAG to implement the region's growth policies.*

SCAG staff comments: The Draft EIS/EIR for the Bay-Delta Project details various alternative water related facilities, that although they are not located within the SCAG region, their timing, financing and location could impact the SCAG region's growth policies. The Draft EIS/EIR in addressing the SWP portion of the SCAG region, discusses a number of potential growth and land use impacts on southern California as a result of implementing the various Bay-Delta alternatives. Among these stated impacts are:

"Agricultural water users in this region would receive some of the additional water supply developed by most of the configurations, ranging from about 60,000 to 700,000 acre-feet (annual average)";

"Indirect changes in land use may result from the Water Use Efficiency Program. In some instances, agricultural land may be removed from production because of increased costs and decreased profitability which could result from required efficiency improvements or increased district water charges. Conversely, improved efficiency may allow the continued viability of agriculture in some areas.";

"Salinity intrusion avoidance benefits of the Levee System Integrity Program would also accrue to this region. Substantial conversion of agricultural land in the Delta Region could shift some production to desert areas in southern California, such as the Imperial Valley. Additional water would be available to SWP contractors in the South Coast. Potential charges imposed on agricultural water use to recover costs of program components could lead to significant changes in agricultural activities (such as, crop selection and water use)";

"Water transfers would increase agricultural production, incomes, and employment opportunities associated with any transfer that uses the water for agricultural production outside the Central Valley. The net change in jobs is expected to be minimal, with only minor effects on community stability";

Considering the generalized presentation and diversity of the land use and growth impact data in the Draft EIS/EIR, as noted above, it is likely that the Bay-Delta Project would have generally supportive impacts on growth policies in the SCAG region. The Bay-Delta Project is consistent with this core RCPG policy.

**b. Ancillary Growth Management Policies**

- 3.05 *Encourage patterns of urban development and land use which reduce costs on infrastructure construction and make better use of existing facilities.*

SCAG staff comments. The Bay-Delta Project alternative configurations would facilitate delivery of increased quantities SWP water to the southland over the No Action strategy. This would make more water of a higher quality available to serve existing as well as future development patterns. This additional water would help reduce the costs of infrastructure construction in southern California and facilitate the better use of existing facilities. The Bay-Delta Project is supportive of this ancillary RCPG policy.

- 3.07 *Support subregional policies that recognize agriculture as an industry, support the economic viability of agricultural activities, preserve agricultural land, and provide compensation for property owners holding land in greenbelt areas..*

SCAG staff comments. See previous staff comments on SCAG Policy 3.03 as they pertain to supporting agriculture in southern California. The Bay-Delta Project is generally supportive of this ancillary SCAG policy.

- 3.19 *Support policies and actions that preserve open space areas identified in local, state, and federal plans.*

SCAG staff comments. The Draft EIS/EIR acknowledges that, "implementing any of the CALFED project would potentially result in a gain in open space/habitat uses, benefiting recreational opportunities". Although these recreational/open space/habitat benefits would occur primarily in the Bay-Delta region, they would benefit all Californians directly or indirectly. The Draft EIS/EIR acknowledges negligible beneficial impacts on recreational resources would occur due to improved water quality in the SWP and CVP service areas outside the Central Valley. Water quality delivered is expected to be greatly improved because of the operations of the isolated facilities. This is expected to result in beneficial impacts on recreational opportunities at receiving reservoirs and canals". As a whole the Bay-Delta Project would benefit open space/habitat/recreational resources. The Bay-Delta Project is supportive of this ancillary SCAG policy.

- 3.20 *Support the protection of vital resources such as wetlands, groundwater recharge areas, woodlands, production lands and lands containing unique and endangered plants and animals.*

SCAG staff comments. The Draft EIS/EIR acknowledges that the Bay-Delta Program, "will be implemented through the program of adaptive management, because the effects on the ecosystem are uncertain." This includes an extensive discussion of potential impacts of the various alternatives on fisheries and aquatic ecosystems, and vegetation and wildlife.

The Project would include the beneficial impacts of the Ecosystem Restoration and Water Quality programs, in addition to selective beneficial and adverse impacts. The following adverse impacts include: increased entrainment loss, reduced productivity, delayed migration of fish species, and adverse impacts to spawning and rearing habitat. The Ecosystem Restoration and Water Quality programs would benefit many aquatic species through increased habitat abundance and improved habitat conditions. The Draft EIS/EIR acknowledges that implementation of the CALFED Project would have minimal impact on fisheries and aquatic resources in Southern California, although some potential exists for an increase in organisms transported with an increased quantity of water, in addition to the potential for introduction of non-native species.

With regard to impacts to vegetation and wildlife, the CalFed Project would result in minimal adverse impacts on vegetation and wildlife communities, resulting from increased facility construction, but will provide benefits to some species as a result of enhancement and creation of habitat. The Ecosystem Restoration and Water Quality Programs will lead to improved habitats. The Draft EIS/EIR acknowledges that implementation of the CALFED Project could result in the loss of some habitats, and result in the loss or degradation of wetland or riparian communities in southern California as a result of increased urban and industrial growth.

The Bay-Delta Program is supportive of this ancillary SCAG policy.

The **Water Quality Chapter (WQC)** core recommendations and policy options relate to the two water quality goals: to restore and maintain the chemical, physical and biological integrity of the nation's water; and, to achieve and maintain water quality objectives that are necessary to protect all beneficial uses of all waters. The core recommendations and policy options that are particularly applicable to CALFED Bay-Delta Program include the following:

- 11.1 *Streamline water quality regulatory implementation. Identify and eliminate overlaps with other regulatory programs to reduce economic impacts on local businesses.*

SCAG staff comments. The Draft EIS/EIR includes an extensive discussion of the Bay-Delta Water Quality Program. The Program will result in water quality improvements for SCAG areas served by SWP water including in an estimated 14% to 41% reduction in salinity for a net benefit of \$180 million. Numerous water

quality benefits will occur in the Delta area as a result of the water quality program measures. We encourage the CALFED Bay-Delta Program to specifically support the elimination of overlaps in water quality programs and their enforcement, with a specific reference to reducing economic impacts on local business. The Bay-Delta Program is generally consistent with this core RCPG policy.

*11.02 Encourage “watershed management” programs and strategies, recognizing the primary role of local government in such efforts.*

SCAG staff comments. The CALFED Bay-Delta program includes a wide range of watershed management programs and strategies, including: water storage and conveyance, ecosystem restoration, water quality improvement, water use efficiency, levee system integrity, water transfers, and coordinated watershed management. The coordinated watershed management approach focuses on: providing intergovernmental, interagency, and interwatershed coordination of restoration and management efforts including data collection, implementation and monitoring of results. The planning process takes advantage of local watershed management councils which involve various local stakeholders. The Draft EIS/EIR acknowledges the important role of water agencies in watershed management, but fails to emphasize the primary role of local governments, including cities, counties and subregional agencies (associations of governments) in developing watershed management programs. The discussion of watershed oversight in the Watershed Management Strategy Technical Appendix and at appropriate locations in the Draft EIS/EIR should emphasize the primary role of local government in the coordinated watershed management process. The Bay-Delta Program is partially consistent with this core RCPG policy.

*11.03 Coordinate watershed management planning at the subregional level by (1) providing consistent regional data; (2) serving as a liaison between affected local, state, and federal watershed management agencies; and (3) ensuring that watershed planning is consistent with other planning objectives (e.g., transportation, air quality, water supply)*

SCAG staff comments. The focus of the CALFED Bay-Delta Program is on both local and statewide coordinated watershed management. The Draft EIS/EIR’s orientation toward alternative strategies and major programs that focus on large hydrologic regions fails to recognize the importance of coordinated planning at the subregional level. For example, within the SCAG region, there are currently 14 subregions (Arroyo Verdugo, City of Los Angeles, Coachella Valley Association of Governments, Imperial Valley Association of Governments, North Los Angeles County, Orange County Council of Governments, San Bernardino Associated Governments, San Gabriel Valley Council of Governments, South Bay Cities Association, Gateway Cities Council of Governments, Ventura Council of Governments, Western Riverside Council of Governments, Westside Cities and Las Virgenes Malibu Conejo Council). SCAG works with and relies on data and planning input from these subregions in our ongoing watershed management

planning activities. We encourage the CALFED Bay-Delta Program to recognize the important role of subregions in (1) providing consistent regional data; (2) serving as a liaison between affected local, state, and federal watershed management agencies; and (3) ensuring that watershed planning is consistent with other planning objectives (e.g., transportation, air quality, water supply). The Bay-Delta Program is partially consistent with this core RCPG policy.

*11.04 Encourage opportunities for pollution reduction marketing and other market-incentive water quality programs as an alternative to strict command-and-control regulation.*

SCAG staff comments. The CALFED Bay-Delta Program Technical Appendix on Water Quality Program includes a number of references to market-based incentive solutions which address urban and industrial runoff, wastewater and industrial discharge, agricultural drainage and runoff, water treatment, water management, and human health. Among the methods emphasized in the Draft Program are: incentives to reduce copper, zinc, and cadmium from urban and industrial runoff; source control incentives for chlorpyrifos and diazinon pesticide removal; source control incentives for nutrient loading reduction; financial and regulatory incentives for removal of oxygen depleting substances from wastewater and industrial discharges; voluntary landowner participation and compensated arrangements to reduce selenium and salinity loadings from agricultural runoff; incentives and assistance for implementation of agricultural land use practices and strategies to reduce sediment loadings; and, various incentives to reduce pathogens, turbidity and bromides in water treatment facilities. The Bay-Delta Program is consistent with this core RCPG policy.

*11.05 Support regional efforts to identify and cooperatively plan for wetlands to facilitate both sustaining the amount and quality of wetlands in the region and expediting the process for obtaining wetlands permits.*

SCAG staff comments. The Draft EIS/EIR acknowledges significant but mitigable impacts on wetland and riparian communities in the Delta Region, Sacramento River Region and southern California. Specifically, in southern California, the Draft EIS/EIR notes that increased urban and industrial growth that will be facilitated by an increase in the supply and reliability of water resulting from Bay-Delta programs, will result in loss or degradation of wetland and riparian communities. The Bay-Delta Program is consistent with this core RCPG policy.

*11.06 Clean up the contamination in the region's major groundwater aquifers since its water supply is critical to the long-term economic and environmental health of the region. The financing of such clean-ups should leverage state and federal resources and minimize significant impacts on the local economy.*

SCAG staff comments. The Draft EIS/EIR acknowledges significant groundwater benefits to Southern California. These benefits would accrue to Southern

California, largely by making more SWP water available which could supplement local groundwater supply in certain areas and facilitate the cleanup of groundwater basins by providing supplemental water for mixing. This water could partially offset groundwater overdrafts. The Bay-Delta Program is consistent with this core RCPG policy.

- 11.07 Encourage water reclamation throughout the region where it is cost-effective, feasible, and appropriate to reduce reliance on imported water and wastewater discharges. Current administrative impediments to increased use of wastewater should be addressed.*

SCAG staff comments. The Draft EIS/EIR acknowledges that the Water Use Efficiency Program will facilitate a number of water recycling actions, including: helping urban and agricultural water conservation councils facilitate water reclamation/recycling; expand state and federal conservation and recycling programs; help water suppliers comply with federal regulations on urban water management; and, provide regional planning assistance which can increase opportunities for use of recycled water. The Bay-Delta Program is consistent with this core RCPG policy.

- 11.08 Ensure wastewater treatment agency facility planning and facility development be consistent with population projections contained in the RCPG, while taking into account the need to build wastewater treatment facilities in cost-effective increments of capacity, the need to build well enough in advance to reliably meet unanticipated service and storm water demands, and the need to provide standby capacity for public safety and environmental protection objectives.*

SCAG staff comments. SCAG has worked with wastewater treatment facility providers in the southland to ensure that their facilities are developed in a manner consistent with population projections contained in the Regional Comprehensive Plan and Guide. In light of the important role that recycling of wastewater plays in the southern California's wastewater facility planning, it is important that the planning and sizing of treatment facilities be closely coordinated with regional growth forecasts. We ask that the Draft EIS/EIR for the Bay-Delta Project be revised to acknowledge the importance of coordination of water planning with regional plans and the use of regional growth forecasts in water and wastewater facility design. Based on the information in the Draft EIS/EIR, we are unable to determine that the Bay-Delta Program is consistent with this core RCPG policy.

The Water Resources Chapter (WRC) is a non-mandated chapter, and it is provided for information and advisory purposes. The recommendations contained in this chapter to fulfill the stated goals and objectives do not create new legal mandates for local governments or other regional organizations. SCAG signed a Memorandum of Understanding (MOU) with the Metropolitan Water District (MWD), the largest wholesale water agency in the region, to develop the WRC. The WRC also includes projections of water supply and demand for areas within the SCAG region, outside the boundaries of



MWD. Population and growth projections on which the WRC was based, were developed through the year 2010, and have not been updated to reflect recently adopted SCAG growth forecasts through the year 2020.

Projected Water Demand in the MWD Service Area in 2010 (Million Acre Feet)

| County                    | 2010        |
|---------------------------|-------------|
|                           |             |
| Los Angeles               | 1.93        |
| Orange                    | 0.73        |
| Riverside                 | 0.62        |
| San Bernardino            | 0.30        |
| Ventura                   | 0.15        |
| <b>Within SCAG Region</b> | <b>3.73</b> |
| San Diego                 | 0.81        |
| <b>MWD Service Area</b>   | <b>4.54</b> |

SCAG staff comments. The Draft EIS/EIR acknowledges that the Bay-Delta Project utilizes Draft California Water Plan Update 1995 and 2020 forecasted South Coast region water demand for urban, agricultural and environmental water use under average and drought conditions. These forecasts are generally consistent with an extrapolation of the above MWD forecasts, which were based in part on SCAG-94 forecasts. We encourage the CALFED to utilize currently adopted SCAG and other council of government's growth forecasts for population, housing, and employment as inputs to subsequent runs of the urban water use forecasting model. The Bay-Delta Program is generally supportive of this ancillary RCPG policy.

Potential Water Supply for the MWD Service Area in 2010 (Million Acre Feet)

|                                 | Average Year Supply | Minimum Year Supply |
|---------------------------------|---------------------|---------------------|
| Existing Supplies               |                     |                     |
| Local Production                | 1.05                | 1.05                |
| Reclaimed Water                 | 0.40                | 0.40                |
| Los Angeles Aqueducts           | 0.37                | 0.12                |
| Colorado River                  | 0.62                | 0.62                |
| State Water Project             | 1.56                | 0.21                |
| <b>Total</b>                    | <b>4.00</b>         | <b>2.40</b>         |
| Potential Increases in Supplies |                     |                     |
| Additional Colorado River       | 0.45                | 0.45                |
| Additional SWP & Transfer       | 0.20                | 1.13                |
| Reclaimed Water                 | 0.27                | 0.27                |
| Groundwater Recovery            | 0.10                | 0.10                |
| <b>Total</b>                    | <b>1.02</b>         | <b>1.95</b>         |
| <b>Total Supplies</b>           | <b>5.02</b>         | <b>4.35</b>         |

SCAG staff comments. The Draft EIS/EIR acknowledges that the Bay-Delta Program utilizes Draft California Water Plan Update 1995 and 2020 forecasted South Coast region water forecasts under average and drought conditions. The Draft California Water Plan Update identifies 1995 and 2020 estimated South Coast region water (surface water, groundwater, recycled and/or desalted) supplies under average and drought conditions. These estimates are generally consistent with an extrapolation of the above MWD estimates, which were based in part on local water agency plans and studies. The Bay-Delta Program is generally supportive of this ancillary RCPG policy.

Strategies to Balance Supply and Demand in MWD Service Area in 2010 (Million Acre Feet)

|                               | Average Year Conditions | Minimum Supplies Condition |
|-------------------------------|-------------------------|----------------------------|
| BMP's                         | 0.56                    | 0.56                       |
| Existing Conservation         | 0.21                    | 0.21                       |
| Rationing                     |                         | 0.49                       |
| <b>Total Demand Reduction</b> | <b>0.77</b>             | <b>1.26</b>                |

SCAG staff comments. The Draft EIS/EIR acknowledges that the Bay-Delta Program utilizes Draft California Water Plan Update 1995 and 2020 forecasted potential gain in water supplies by application of the options most likely to be implemented in the South Coast region by 2020 under average and drought conditions. These estimates are generally consistent with an extrapolation of the above MWD estimates, which were based in part on local water agency plans and studies. The Draft Plan estimates are more optimistic than the older MWD figures, which is indicative of the identification of additional options to meet shortfalls under average and drought conditions. Of particular significance is the Draft Plan's 2020 remaining shortfall under drought conditions of 25 thousand acre feet . This number represents a reduction from the 44 thousand acre feet shortfall in the 2010 WMD estimate. It would signify less of a need for rationing under drought conditions, if all of the identified options are successfully implemented. The Bay-Delta Program is generally supportive of this ancillary RCPG policy.

Programs to Meet Future Water Demands

1. State Water Project Programs
  - South Delta Improvements
  - Kern Water Bank
  - Los Banos Grande Reservoir

SCAG staff comments. The Draft EIS/EIR acknowledges the above three SWP programs, in addition to the supply/conveyance programs that makeup the Bay-Delta Program, will result in increased water to meet southland needs. State Water Project users south of Kern County would receive increased SWP water supply of 2,468 TAF in 2020. The Bay-Delta Program is generally supportive of this ancillary RCPG list of programs, in addition to providing the projects that flow from the program itself.

2. Water Transfer and Exchange Programs

- Arvin-Edison/Metropolitan Water Storage and Exchange Program
- Semitropic/Metropolitan Water Storage and Exchange Program
- Dudley Ridge/Metropolitan Water Transfer Program

SCAG staff comments. The Draft EIS/EIR acknowledges that the Bay-Delta Program includes a comprehensive policy framework for water transfer rules, baseline data collection, public disclosure, and analysis and monitoring of water transfers, both short-and long term. It acknowledges that the specific water transfers, however, will be dependent on locally developed agreements and assurances. The Bay-Delta Program is generally supportive of this ancillary RCPG list of programs, in addition to providing the projects that flow from the program itself.

3. Local Management Strategies

- Water Reclamation
- Groundwater Management Programs
- Groundwater Recovery
- Surface Water Management
- Desalination
- Gray Water

SCAG staff comments. The Draft EIS/EIR addresses water reclamation, groundwater management, groundwater recovery and surface water management programs and projects that would be facilitated by the Bay-Delta Program. The Bay-Delta Program is generally supportive of this ancillary RCPG list of strategies, in addition to providing the projects that flow from these strategies.

4. Management Response During Drought or Other Emergencies

SCAG staff comments. The Draft EIS/EIR addresses drought management under the Bay-Delta Program's water use efficiency program. This program identifies a total of 4,080,000 acre-feet annually of new water savings statewide that accrue from urban conservation, agricultural conservation and urban recycling strategies. The Bay-Delta Program is generally supportive of this ancillary RCPG list of strategies, in addition to providing the projects that flow from these strategies.

## Potential Water Issues

### 1. Growth Management

*Issue: What is the relationship between growth management and water supply?*

*Planning Strategy: MWD commitment to continuing to accommodate population growth and to remain consistent with regional growth management plans.*

SCAG staff comments. See previous staff comments on SCAG's RCPG policies 3.01 and 11.08 and the discussion under "Projected Water Demand in the MWD Service Area in 2010". The Bay-Delta Program is partially supportive of this ancillary RCPG planning strategy.

### 2. Water Transfer Policies

*Issue: What role will water transfers (also known as water marketing) take in the future to respond to the water needs of urban, agricultural and environmental users- statewide and in Southern California?*

*Planning Strategy: MWD commitment to develop a full range of voluntary transfers with willing partners, that protect, and where feasible, enhance environmental resources.*

SCAG staff comments. See previous staff comments on SCAG's RCPG policies 3.07, 3.19 and 11.04 and the Water Resource Chapter discussion on "Water Transfer and Exchange Programs". The Bay-Delta Program is supportive of this ancillary RCPG planning strategy.

### 3. Water Supply Development and Environmental Regulations

*Issue: What strategies can water agencies take for future development of water supplies and facilities in view of increasingly stringent environmental regulations?*

*Planning Strategy: MWD integrates environmental values in its decision making procedure for water resources and facilities development. Environmental needs for available water supply and protection of endangered species and their habitats offer a significant challenge to MWD and its member agencies to develop effective physical, institutional, and management solutions that lead to "win-win-win" outcomes for the environment, agricultural and urban users.*

SCAG staff comments. The Draft EIS/EIR incorporates a comprehensive series of strategies that address ecosystem restoration, which address restoration of ecosystem functions and the recovery of Bay-Delta species. Two extensive technical appendices detail the Ecosystem Restoration Program plan. The Draft

EIS/EIR discusses environmental water uses from a statewide perspective, and acknowledges that although southern California's environmental water uses are not as great as those in the Bay-Delta, all Californians bear responsibility for helping to maintain and enhance Bay-Delta ecosystem resources. Given southern California's extensive use of State Water Project water, local government has a responsibility to continue to support protection and enhancement of environmental water uses in both the north and south. The Bay-Delta Program is generally supportive of this ancillary RCPG planning strategy.

#### 4. Desalination

*Issue: How could desalination contribute to future water supply?*

*Planning Strategy: MWD is currently supporting brackish groundwater desalinization through its Groundwater Recovery Program and actively supporting and participating in research efforts for ocean desalination.*

SCAG staff comments. The Draft EIS/EIR acknowledges that the Bay-Delta Program will result in a reduction in the salinity of SWP waters available to Southern California. The reduction will result in a 14% to 41% reduction in salinity for a net benefit of \$180 million annually in Southern California. The Bay-Delta Program is generally supportive of this ancillary RCPG planning strategy.

#### 5. Conservation of Storm Runoff

*Issue: How can conservation of storm runoff enhance the region's water supply?*

*Planning Strategy: It is imperative to maintain existing recharge basins in the San Gabriel and Santa Ana river systems at optimum percolation rates with debris management programs and prevent potential contamination of groundwater from urban runoff into recharge areas. Specific projects which would afford an increase in storm runoff capture, like the Long Beach Harbor/Los Angeles River project and maximizing use of existing dams and reservoirs, could increase groundwater recharge.*

SCAG staff comments. The Draft EIS/EIR includes project designs that range from no new storage to over 6.0 MAF of storage. New storage facilities will result in the capture of storm water and melt water runoff, depending on location. The Bay-Delta Program is generally supportive of this ancillary RCPG planning strategy.

#### 6. Potential for Increases in the Use of Reclaimed Water

*Issue: What is the potential of increasing the use of reclaimed water?*

*Planning Strategy: Reclaimed water is a reliable resource which can be used to augment existing supplies and among the efforts that should be pursued include*

*seeking political support, understanding benefit cost analysis, overcoming funding issues, resolving regulatory issues and getting greater public acceptance.*

SCAG staff comments. See previous staff comments on SCAG's RCPG policies 11.04 and 11.07 and the Water Resource Chapter discussions on "Local Management Strategies" and "Management Response During Drought and Other Emergencies". The Bay-Delta Program is generally supportive of this ancillary RCPG planning strategy.

## Water Supply in the Non-MWD Area

### 1. Reliability of Imported Sources

*SCAG recognizes that a number of issues need to be resolved before water transfers can be successful and recommends initiating a dialog among local governments, water districts, and the State of California on issues of land use, water resources and water marketing.*

SCAG staff comments. See previous staff comments on SCAG's RCPG policies 3.07, 3.19 and 11.04 and the Water Resource Chapter discussions on "Water Transfer and Exchange Programs" and "Water Transfer Policies". The Draft EIS/EIR acknowledges that the Bay-Delta Program will significantly increase the reliability of imported SWP water for those non- MWM areas of the SCAG region which presently receive SWP water. The Bay-Delta Program is supportive of this ancillary RCPG planning issues resolution.

### 2. Groundwater Quality

*SCAG recognizes a concern by many water agencies outside of MWD of groundwater contamination and overdraft conditions in some areas.*

SCAG staff comments. See previous staff comments on SCAG's RCPG policies 3.20, 11.01 and 11.06. The Bay-Delta Program is supportive of this ancillary RCPG planning issues resolution.

### 3. Drinking Water Quality Standards

*SCAG recognizes a concern by several water providers of the increasing costs of meeting treatment requirements under Federal and State drinking water laws.*

SCAG staff comments. The Draft EIS/EIR includes a discussion on water quality problems and costs. Configurations which result in reduced salinity levels in SWP water will help non-MWH water providers in meeting State and Federal drinking water standards. The Bay-Delta Program is generally supportive of this ancillary RCPG planning issues resolution.

## **Consistency with the Resolution in Support of Consensus Planning to Address the Use of Surplus Water in the Colorado River System**

On December 4, 1997 SCAG approved Resolution #97-381-1 in support of consensus planning to address the use of surplus water in the Colorado River system. The resolution acknowledges the following:

- The continued economic well-being of the urban, business and agricultural sectors of southern California depend on a reliable and affordable supply of water from the Colorado River.
- Many of SCAG member jurisdictions are dependent either solely or in part on water supplies from the Colorado River.
- The water supplies needed by these SCAG member jurisdictions and in southern California as a whole are threatened by the historic and continuing use of surplus water in the Colorado River system.
- That although David Kennedy, Director of the California Department of Water Resources, is currently working with the Colorado River Board of California to construct a consensus plan to address the historic use of California's surplus water of Colorado River water, no consensus on this issue has yet been reached.

The resolution resolves the following:

- *SCAG supports the continuing efforts of Director Kennedy and the Colorado River Board of California to construct a consensus plan to address the historic use of California's surplus water of Colorado River water.*
- *SCAG specifically supports a plan which calls for the historic use of surplus water to be addressed with a combination of water transfers as the result of conservation in the agricultural sectors and a reasonable wheeling cost that facilitates water transfers but does not result in cost shifting or reduction in water service reliability for non-participating agencies.*

SCAG staff comments. See previous staff comments on SCAG's RCPG policies 3.07, 3.19 and 11.04 and the Water Resource Chapter discussion on "Water Transfer and Exchange Programs". The Bay-Delta Program will provide additional water and a more reliable source of water to meet southern California's water needs, especially those which will be impacted by a reduction of water from the Colorado River. Although the Draft EIS/EIR begins to address some of the water transfer issues raised by this SCAG resolution, it does not address the matter of reasonable wheeling costs nor the shifting of costs or reduction of service reliability for non-participating agencies. The Bay-Delta Program is partially supportive of this SCAG resolution.

## SOUTHERN CALIFORNIA ASSOCIATION OF GOVERNMENTS

### *Roles and Authorities*

**THE SOUTHERN CALIFORNIA ASSOCIATION OF GOVERNMENTS** is a *Joint Powers Agency* established under California Government Code Section 6502 et seq. Under federal and state law, the Association is designated as a Council of Governments (COG), a Regional Transportation Planning Agency (RTPA), and a Metropolitan Planning Organization (MPO). Among its other mandated roles and responsibilities, the Association is:

! Designated by the federal government as the Region's **Metropolitan Planning Organization** and mandated to maintain a continuing, cooperative, and comprehensive transportation planning process resulting in a Regional Transportation Plan and a Regional Transportation Improvement Program pursuant to 23 U.S.C. '134(g)-(h), 49 U.S.C. '1607(f)-(g) et seq., 23 C.F.R. '450, and 49 C.F.R. '613. The Association is also the designated **Regional Transportation Planning Agency**, and as such is responsible for both preparation of the Regional Transportation Plan (RTP) and Regional Transportation Improvement Program (RTIP) under California Government Code Section 65080.

! Responsible for developing the demographic projections and the integrated land use, housing, employment, and transportation programs, measures, and strategies portions of the **South Coast Air Quality Management Plan**, pursuant to California Health and Safety Code Section 40460(b)-(c). The Association is also designated under 42 U.S.C. '7504(a) as a **Co-Lead Agency** for air quality planning for the Central Coast and Southeast Desert Air Basin District.

! Responsible under the Federal Clean Air Act for determining **Conformity** of Projects, Plans and Programs to the State Implementation Plan, pursuant to 42 U.S.C. '7506.

! Responsible, pursuant to California Government Code Section 65089.2, for **reviewing all Congestion Management Plans (CMPs) for consistency with regional transportation plans** required by Section 65080 of the Government Code. The Association must also evaluate the consistency and compatibility of such programs within the region.

! The authorized regional agency for **Inter-Governmental Review** of Programs proposed for federal financial assistance and direct development activities, pursuant to Presidential Executive Order 12,372 (replacing A-95 Review).

! Responsible for reviewing, pursuant to Sections 15125(b) and 15206 of the CEQA Guidelines, **Environmental Impact Reports** of projects of regional significance for consistency with regional plans.

! The authorized **Areawide Waste Treatment Management Planning Agency**, pursuant to 33 U.S.C. '1288(a)(2) (Section 208 of the Federal Water Pollution Control Act)

! Responsible for preparation of the **Regional Housing Needs Assessment**, pursuant to California Government Code Section 65584(a).

! Responsible (along with the San Diego Association of Governments and the Santa Barbara County/Cities Area Planning Council) for preparing the **Southern California Hazardous Waste Management Plan** pursuant to California Health and Safety Code Section 25135.3.